

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

-----	X	
	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----	X	

**EEPK’S CERTIFICATE OF COMPLIANCE WITH THE ORDER GRANTING
MOTION TO COMPEL FULL CLAWBACK OF DEBTOR’S DOCUMENT
PRODUCTION AND RELATED RELIEF**

In accordance with this Court’s Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief dated May 13, 2014 (the “**Clawback Order**”), Erste Europäiische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., Hypothekbank Frankfurt AG, and Hypothekbank Frankfurt International S.A. (“**EEPK**”), by and through its counsel, Ballard Spahr LLP (“**Ballard Spahr**”), hereby certify as follows:

1. On May 7, 2014, Ballard Spahr received a hard drive with a document production made by the City of Detroit (the “**City Production**”). The City Production was processed and uploaded by EEPK’s third party vendor for review.
2. On May 13, 2014, Ballard Spahr’s third party vendor was instructed to purge the City Production from its systems, and on May 14, 2014, Ballard Spahr received confirmation from its third party vendor that the City Production had been purged from its systems

3. Also on May 14, 2014, Ballard Spahr caused the hard drive containing the City Production to be returned to counsel for the City via FedEx for delivery by 10:30 a.m. ET on May 15, 2014.

4. In addition, Ballard Spahr has confirmed that (i) all physical copies of the City Production or any portions thereof and (ii) all work product reflecting the contents of any document in the City Production has been destroyed.

5. Accordingly, EEPK has fully complied with each of the provisions set forth in paragraph 2 of the Clawback Order.

May 14, 2014.

Respectfully submitted,

/s/ Matthew G. Summers

Matthew G. Summers, Esquire
BALLARD SPAHR LLP
919 North Market Street, 11th Floor
Wilmington, Delaware 19801
Tel: (302) 252-4428
Fax: (302) 252-4466
E-mail: summersm@ballardspahr.com

Vincent J. Marriott, III, Esquire
BALLARD SPAHR LLP
1735 Market Street, 51st Floor
Philadelphia, Pennsylvania 19103
Tel: (215) 864-8236
Fax: (215) 864-9762
E-mail: marriott@ballardspahr.com

-and-

Howard S. Sher, Esquire (P38337)
JACOB & WEINGARTEN, P.C.
Somerset Place
2301 W. Big Beaver Road, Suite 777
Troy, Michigan 48084
Tel: (248) 649-1200
Fax: (248) 649-2920
E-mail: howard@jacobweingarten.com

*Counsel for Hypothekenbank Frankfurt AG,
Hypothekenbank Frankfurt International S.A., and
Erste Europäische Pfandbrief- und
Kommunalkreditbank Aktiengesellschaft in
Luxemburg S.A.*

CERTIFICATE OF SERVICE

I, Matthew G. Summers, state that on May 14, 2014, I filed a copy of the foregoing Certification of Compliance with Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief using the Court's ECF system and I hereby certify that the Court's ECF system has served counsel to the City and all registered users that have appeared in the above-captioned case. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Matthew G. Summers

Matthew G. Summers

E-mail: summersm@ballardspahr.com